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UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Periodic Reporting
(Proposal Seven)

Docket No. RM2021-1

PUBLIC REPRESENTATIVE MOTION FOR ISSUANCE OF INFORMATION REQUEST

(February 12, 2021)

Pursuant to 39 C.F.R. § 3001.21(a) and 39 C.F.R. § 3007.3(c), the Public Representative requests that an Information Request be issued to obtain additional clarifying data and information from the Postal Service concerning the proposed changes to analytical methods for calculating attributable Special Purpose Route (SPR) city carrier costs, labeled as Proposal One.[1] The proposed questions seek information that will allow participants to provide more constructive comments and evaluate whether the proposal meets the applicable legal and regulatory requirements. Obtaining this information will also contribute to a better understanding of how the Postal Service has interpreted Commission rules and allow the Commission to make a fully informed, reasoned determination on whether Proposal One meets applicable legal and regulatory requirements, including 39 U.S.C. § 3652(e)(2) and 39 C.F.R. part 3050.

Proposed Question(s)

1. Please refer to Docket No. RM2021-1, USPS-RM2021-1-1 - Public Material Relating to Proposal Seven, File: XMAS INTER SCF Variability Equations.sas, Datastep: XTER_SCF_Combo_Reg, which calculates the “logged” variables used in the Christmas Inter-SCF Variability Equations.

[1]Docket No. RM2020-1, Petition of The United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Seven) November 9, 2020 (Petition).

a. Please refer to the term: cfm, in the term $\left(\frac{cfm}{g\_cfm}\right)$. Please confirm that the term cfm refers to the **mean of the sum** of cubic foot miles for each route per cost segment. If you do not confirm, please explain.

b. Please refer to the term: g_cfm, in the term $\left(\frac{cfm}{g\_cfm}\right)$. Please confirm that g_cfm refers to the **mean of the sum** of cubic foot miles for all routes and cost segments – i.e. for all observations. If you do not confirm, please explain the meaning of this term.

c. Please refer to the term: $atripmiles$, in the term $\left(\frac{atripmiles}{g\_stripmiles}\right)$. Please confirm that $atripmiles$ refers to the ***mean*** (not the mean of the sum) of tripmiles for each route per cost segment. If you do not confirm, please explain.

d. Please refer to the term, $g\_stripmiles$, in the term $\left(\frac{atripmiles}{g\_stripmiles}\right)$. Please confirm that $g\_stripmiles$, refers to the **mean of the sum** of tripmiles for all routes and cost segments – i.e. for all observations. If you do not confirm, please explain the meaning of this term.

e. If you confirm "1.a" and "1.b," please explain the reason different measures of the numerator (i.e. mean of the sum versus the mean of cfm) were used for these terms in the above-named regression.

2. Please refer to Docket No. RM2014-6, USPS-RM2014-6/1 - Public Material Relating to Proposal Six, File: Est.IntePDC.Clust.Area.NDC.Variab.sas, Datasteps: Inter_PDC_Van_Reg, and Inter_PDC_TT, and which calculates the "logged" variables used in the Inter-P&DC, Van and Tractor Trailer, regressions.[2]

a. Please confirm that the term: cfm, in the term $\left(\frac{cfm}{g\_cfm}\right)$ refers to the **mean** of cubic foot miles per route, per cost segment. If you do not confirm, please explain the meaning of cfm.

[2] This library reference was filed in Docket No. RM2014-6, USPS, Periodic Reporting (Proposals Three Through Eight), USPS-RM2014-6/1 - Public Material Relating to Proposal Six (2014 Transportation Study Library Reference), June 20, 2014.

b. If you confirm “1.a” please explain the reason datastep: XTER_SCF_Combo_Reg (in RM2021-1), uses the mean of the sum of cfm per route per cost segment in the numerator, while datasteps Est.InterPDC.Clust.Area.NDC.Variab.sas, Inter_PDC_Van_Reg and Inter_PDC_TT (in Docket No. RM2014-7) use the mean of cfm per route per cost segment, in the numerator of $\left(\frac{cfm}{g\_cfm}\right)$.

3. If any of the regressions employed in RM2021-1 incorrectly define cfm as the **mean of the sum** of cubic foot miles, rather than the **mean** of cubic miles for each route per cost segment, please re-run any such regressions and file the regression code, log and output associated with each regression which incorrectly defined the term cfm.